

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENWOOD DIVISION

United States of America,)	Civil Action No. 8:18-cv-01742-TMC
)	
Plaintiff,)	
)	
vs.)	
)	
Devinder Singh Dhanoa, a/k/a)	<u>CONSENT MOTION</u>
Sukhvinder Singh, a/k/a Vora)	<u>FOR EXTENSION</u>
Jayendra Amritlal, a/k/a Dalip)	
Kumar,)	
)	
Defendant.)	
)	

The defendant, Devinder Singh Dhanoa, a/k/a Sukhvinder Singh, a/k/a Vora Jayendra Amritlal, a/k/a Dalip Kumar, by and through the consent of its attorneys and the consent of plaintiff's attorneys, hereby move this Honorable Court for an extension for the defendant to file an Answer pursuant to Rule 6(b)(1)(A), Fed. R. Civ. P., and Local Civil Rule 7.05.

Procedural History

On June 25, 2018, Plaintiff United States of America filed a Complaint to Revoke Naturalization in the above-captioned proceedings. ECF No. 1. Defendant's current deadline to file an Answer to the Complaint is October 5, 2018. The parties have been engaged in active settlement negotiations, and both Plaintiff and Defendant anticipate resolving this matter through the filing of a joint motion for consent judgment. However, the parties continue to negotiate the language and terms of such a consent judgment, and require additional time to reach agreement.

Accordingly, Defendant respectfully requests a 30-day extension of the Answer deadline, until November 5, 2018. In addition, in the event this matter is not resolved through a consent judgment, Defendant requests that the Court stay commencement of discovery, to include the

Rule 26(f) Conference and Report, until 14 days after the extended deadline to Answer, i.e. until November 19, 2018.

On October 3, 2018, Defendant's counsel conferred with counsel for the Plaintiff, Danielle K.S. Lindermuth and Matthew J. Modica, regarding this request. Plaintiff's counsel indicated that they do not oppose a 30-day extension of the Answer deadline or a stay of commencement of discovery.

WHEREFORE, Defendant respectfully moves for a 30-day extension of the Answer deadline, until November 5, 2018, and a stay of commencement of discovery until 14 days after the extended Answer deadline, until November 19, 2018.

Respectfully submitted,

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Dated: October 4, 2018